## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

| In re: Samuel Berger | ) | Case No: 20-43594 |
|----------------------|---|-------------------|
|                      | ) |                   |
| Debtor.              | ) | Chapter 13        |
|                      | ) |                   |
|                      | ) |                   |
|                      | ) |                   |

## MOTION TO EXTEND THE DEADLINE FOR THE FILING OF DEBTOR'S SCHEDULES, STATEMENTS AND CHAPTER 13 PLAN

COME NOW Debtor, by and through Counsel, and moves this Honorable Court to enter and Order extending the deadline in which to file Debtor's schedules, statements and plan. In support of this Motion Debtor states as follows:

- 1. Debtor filed a Chapter 13 in good faith on July 19, 2020.
- 2. The current deadline to file documents is August 3, 2020.
- 3. This Motion is filed before the expiration of the current deadline.
- 4. Counsel for Debtor requests a 14 day extension until August 17, 2020 to have the statements, schedules and Chapter 13 plan on file.
- 5. There have been no prior extension requests made.

WHEREFORE, Debtor prays for an Order extending the deadline for Debtor regarding the filing of Debtor's schedules, statements and Ch. 13 plan until August 17, 2020.

Respectfully Submitted,

/s/ Andrew Kirkwood Smith
Andrew K. Smith, #61640MO
26A North Central Avenue
Clayton, Missouri 63105
314.740.2989 (phone)
314.781.2695 (fax)
Attorney for Debtor

## **Certificate of Service**

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to the parties listed below on August 2, 2020.

Diana Daugherty Chapter 13 Trustee PO Box 430908 St. Louis, MO 63143

Office of the United States Trustee 111 South 10<sup>th</sup> Street Suite 6.353 St. Louis, MO 63102

/s/ Andrew Kirkwood Smith

Attorney for Debtor